	Page 1	
UNITED STATES DIS DISTRICT OF PORTLAND DI	OREGON	
OREGON FIREARMS FEDERATION, INC., et al., Plaintiffs, v. KATE BROWN, et al., Defendants.))) Case Nos.) 2:22-cv-01815-IM,) 3:22-cv-01862-IM,) 3:22-cv-01869-IM,)	
(Continued))	
* VIDEOCONFERENCE * VIDEOTAPED DEPOSITION UPON ORAL EXAMINATION OF EXPERT MARK T. HANISH		
Witness located in:		
Phoenix, Ar	izona	
* All participants appeared via videoconference * DATE TAKEN: JANUARY 13, 2023		
REPORTED BY: Tia B. Reidt, Was Ore	hington RPR, CSR #2798 gon #22-0001	

		Page 2
1 2	(Continued)	
3	MARK FITZ, et al.,	
4	Plaintiffs,) v.	
5	ELLEN F. ROSENBLUM, et al.,) Defendants.)	
6 7	KATERINA B. EYRE, et al.,) Plaintiffs,) V.)	
8 9	ELLEN F. ROSENBLUM, et al.,) Defendants.)	
0	DANIEL AZZOPARDI, et al.,) Plaintiffs,) v.	
2	ELLEN F. ROSENBLUM, et al.,) Defendants.)	
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1	APPEARANCES CONTINUED
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Page 57 And did you encounter the 2004 study in your 1 day-to-day work? 2 It had been quite some time since I had seen 3 that, but I revisited it with -- with these cases. 4 And did Mr. Keane from NSSF also suggest the 5 2004 report? 6 Α. No. 7 Q. How did you come across that? 8 Α. Just researching. 9 And by researching, you mean searching in Q. 10 Google or did you use something else? 11 No, Google. 12 Did you compare the estimates in the 2021 13 National Firearms Survey to any other sources? 14 Not directly. 15 Do you have any source of information about Q. <u>16</u> the 2021 National Firearms Survey other than the 17 <u>information that is in the report itself?</u> 18 Could you say that one more time? <u>A.</u> 19 have --20 Do you know anything about the 2021 National Q. 21 Firearms Survey that is not in the report itself? 22 No, other than looking at some of the 23 extensions on there and then, you know, having personal 24

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knowledge of some of the things, you know, that all,

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Page 58 you know, check out through, you know, just my personal <u>1</u> knowledge of it. <u>2</u> Q. And by extensions, do you mean the appendices <u>3</u> that you included in your report? <u>4</u> <u>A.</u> <u>Yes.</u> <u>5</u> And those are part of the original SSRN Q. <u>6</u> download? <u>Z</u> <u>Yes.</u> 8 <u>A.</u> Have you spoken to Dr. English before? Q. 9 No, I have not spoken to Dr. English. <u>10</u> Did you try to speak with Dr. English about Q. <u>11</u> this report? <u>12</u> I did not. <u>A.</u> <u>13</u> Q. Why not? <u>14</u> The one or two pieces of information out of it <u>15</u> that, you know, supported my opinion on it is what I <u>16</u> referenced out of it, and that was it. 17 Has the 2021 National Firearms Survey been Q. 18 published in a peer-reviewed journal? 19 I do not know. Α. 20 How were the participants for this survey Q. 21 recruited? 22 That I remember -- that is in the -- in the 23 document, and I don't know that you want me to read 24 that and regurgitate it. Or is that what you would 25

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Page 71 pistol grip. That doesn't relate to magazine size; correct? 0. Correct. Α. And that rule doesn't exist in Oregon? 0. Not that I'm aware of, no. Α. With respect to the other difference -- the Q. differences that is in -- the number of rounds that are available and potentially difficult to reload, are those the other differences? Α. Yes. Are there any other differences with a 10-round-capacity magazine or what you call a standard-capacity magazine? Is it -- I missed the point of your question.

- Is there a difference in the magazines?
- Is there a difference in the performance aside from the number of rounds available and potentially the difficulty to reload and the performance of a 10-round magazine or a larger magazine?
- A. No, the mechanical function of the action is the same.
 - Why would FN have introduced this weapon? Q.
- To service customers in the state of California.
 - Do you know of any reason why this weapon Ο.

Page 85 Okay. Ο. 1 And just to kind of elaborate on that a little 2 bit, do you have any training or experience in 3 analyzing surveys or polling data? 4 5 Α. No. Q. Okay. 6 And do you consider yourself an expert in any <u>Z</u> way in polling or statistics? 8 No. Not in polling, other than I think I've <u>A.</u> 9 seen more Frank Luntz videos than I care. <u>10</u> Fair enough. Q. 11 And Frank Luntz, remind me who he is. 12 Oh, he was just the -- just the polling guy 13 that was all over the elections. He used to be the --14 I'm sorry, it was --15 (Speaking simultaneously) pollster; right? 16 (Reporter asks parties to speak one at a 17 time.) 18 (Reporter clarification.) 19 THE WITNESS: I was just making --20 (Reporter clarification.) 21 THE WITNESS: Oh. 22 BY MR. PEKELIS: 23 My question was (inaudible Zoom audio)? 24 (Reporter clarification.) 25

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BY MR. PEKELIS:

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- Q. He's a Republican pollster, Frank Luntz?
- A. I actually don't know his politics. He's the only pollster that I remember seeing on all the TV channels. So I apologize for making a joke.
 - Q. No, that's fine.

I guess the bottom line is you're not in a position to assess the validity or the reliability of the 2021 National Firearms Survey?

- A. I am not a polling expert.
- Q. So in paragraph 28, it looks like you're quoting some of the National Firearms Survey, and I would like to focus on two of the data in that block quote paragraph. You'll see it says "31.1 percent of gun owners or approximately 25.3 million adult Americans have used a gun in self-defense. Gun owners engage in approximately 1.67 million defensive uses of firearms per year."

Do you see that?

- A. Yes.
- Q. Okay.

So first, I want to focus on that 1.67 million defensive uses of firearms per year.

Does that number strike you as accurate?

A. It does.

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CERTIFICATE

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STATE OF WASHINGTON 3

COUNTY OF PIERCE

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I, Tia Reidt, a Certified Court Reporter in and for the State of Washington, do hereby certify that the foregoing transcript of the deposition of MARK T. HANISH, having been duly sworn, on January 13, 2023, is true and accurate to the best of my knowledge, skill and ability.

IN WITNESS WHEREOF, I have hereunto set my hand and seal this 20th day of January, 2023.

/S/ Tia B. Reidt

Washington.

5/15/2026.

NOTARY PUBLIC, State of

My commission expires

Tia B. Reidt, RPR, CSR #22-0001

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